

Exhibit A

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
MIAMI DIVISION
MDL No. 3076
Case No. 1:23-md-03076-KMM

IN RE:
FTX Cryptocurrency Exchange Collapse Litigation

This document relates to:

Garrison, et al. v. Paffrath et al.,
Case No. 23-cv-21023

**DECLARATION OF ADAM M. MOSKOWITZ IN SUPPORT OF
PLAINTIFFS' OPPOSITION TO DEFENDANT ERIKA KULLBERG'S MOTION TO DISMISS
PURSUANT TO FEDERAL RULE OF CIVIL PROCEDURE 12(b)(5)**

I, Adam M. Moskowitz, declare and state as follows:

1. I am Founding and Managing Partner at The Moskowitz Law Firm. I am an attorney duly authorized and licensed to practice and in good standing in the State of Florida. This declaration is based on my personal knowledge, unless otherwise stated, and if called as a witness I could and would testify competently to the facts stated herein.

2. We began an investigation concerning Defendant to ascertain her whereabouts.

3. Our investigation uncovered that Ms. Kullberg went by the name Erika Nicole Shannon before she married Eric Kullberg on April 20, 2019. *See* Search Results, attached as **Exhibit 1**; *see also* Zola Wedding Page, attached as **Exhibit 2**.

4. Ms. Kullberg is still Erika Shannon according to the State Bar of California. *See* State Bar of California, attached as **Exhibit 3**.

5. Plaintiffs also located various addresses for Defendant. *See* Ex. 1.

6. The two most recent addresses, according to Plaintiffs' investigation, were 400 E. 20th Street, Apt. 5h, New York, NY 10009 and 40 Waterside Plaza, Apt. 11D, New York, New York 10010. *See id.*

7. When Plaintiffs made a service attempt at the 400 E. 20th Street, Apt. 5h, New York, NY 10009 address, Plaintiffs' process server was informed that Defendant was the *previous* resident but had since moved.

8. Plaintiffs then attempted service at the 40 Waterside Plaza, Apt. 11D, New York, New York 10010 address on April 6, 2023.

9. As the Return of Service states, the doorman at Waterside Plaza *did not permit the process server to go further than the lobby*, but called the "recipient" of the summons, who advised him to accept service. *See* Return of Service, attached as **Exhibit 4**.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct to the best of my knowledge and behalf.

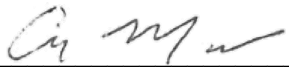
By: 
Adam Moskowitz

Exhibit 1

ADVANCED PERSON SEARCH PLUS

SEARCH CRITERIA

Name: ERIKA NICOLE SHANNON
 Person ID: 165611323953

GLBA: Transactions Authorized by Consumer
 DPPA: Use in the Normal Course of Business

Report Legend

Deceased
 High Risk Indicator
 Household Match



SEARCH RESULTS SUMMARY

ERIKA NICOLE SHANNON	05/##/1990 (32)	612-74-####
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SEARCH RESULTS

NAMES

ERIKA NICOLE SHANNON (Female)
 ERIKA N SHANNON (Female)
 ERIKA SHANNON (Female)
 ERIKA N KULLBERG (Female)
 ERIKA KULLBERG (Female)
 SHANNON ERIKA (Female)

RELATIVES

EILEEN KAY SHANNON 10/##/1992 - Born 30 years ago
 MICHAEL E SHANNON 01/##/1961 - Born 62 years ago
 YOKO SHANNON 10/##/1959 - Born 63 years ago
 DARLENE ANN SHANNON 10/##/1939 - Born 83 years ago
 EDWARD JOHN SHANNON 08/##/1937 - Born 85 years ago
 DEBORAH J NELSON 03/##/1960 - Born 63 years ago - Died on 07/01/2013 at age 53

SOCIAL SECURITY NUMBERS

612-74-####
 Issued: 06/1994 - 10/1994 in CA
 Good

ADDRESSES/PHONES

400 E 20TH ST APT 5H, NEW YORK, NY 10009-8105 NEW YORK (Jan 2020 - Feb 2023) - Best
 40 WATERSIDE PLZ APT 11D, NEW YORK, NY 10010-2636 NEW YORK (Nov 2021 - Aug 2022) -
 401 MASSACHUSETTS AVE NW APT 211, WASHINGTON, DC 20001-7610 D.C (Jun 2014 - Dec 2021) -
 ▲ Residential Care facility.
 PSC 557 BOX 621, FPO, AP 96379-0007 (Oct 2019 - Mar 2021) -
 PSC 557 BOX 621, S SAN FRANCISCO, CA 94080 SAN MATEO (Oct 2019 - Jul 2021) -
 14207 DELAMERE DR, CHESTER, VA 23831-6588 CHESTERFIELD (Jun 2016 - Oct 2019) -
 PSC 559 BOX 5121, FPO, AP 96377-0052 (Jul 2012 - Oct 2014) -
 PSC 559 BOX 5121, S SAN FRANCISCO, CA 94080 SAN MATEO -
 300 MASSACHUSETTS AVE NW APT 529, WASHINGTON, DC 20001-2746 D.C (Aug 2013 - May 2014) -
 832 N NOTRE DAME AVE APT 2B, SOUTH BEND, IN 46617-1550 ST. JOSEPH (Jul 2012 - Jul 2013) -
 1850 COLUMBIA PIKE APT 722, ARLINGTON, VA 22204-6221 ARLINGTON (Jul 2012 - Jul 2013) -
 238 LEWIS HALL, NOTRE DAME, IN 46556-5616 ST. JOSEPH (Jul 2009 - Apr 2014) -
 203 PANGBORN HALL, NOTRE DAME, IN 46556-5620 ST. JOSEPH -
 166 GLENWOOD DR, KISSIMMEE, FL 34743-8146 OSCEOLA (May 2014 - May 2014) -
 2215 MATEO ST, LAKE LAND, FL 33801-6666 POLK (Aug 2012 - Aug 2012) -

DATES OF BIRTH

05/##/1990 (32)

PHONES

(863) 393-6979 (EDT) (Possible Wireless)
 (424) 338-5127 (PDT) (Possible VoIP)
 (202) 450-6533 (EDT) (Possible VoIP)
 (212) 314-7343 (EDT) (Possible VoIP)
 (310) 701-8335 (PDT) (Possible Wireless)
 (681) 217-3788 (EDT) (Possible VoIP)
 (574) 276-7752 (EDT) (Mobile)
 (574) 276-7752 (EDT) (Mobile)
 (804) 768-9417 (EDT)
 (929) 777-0492 (EDT) (Mobile)
 (929) 777-0492 (EDT) (Mobile)

DRIVERS LICENSES

FL - #####
 Issue Date: 07/27/2012
 Expiration Date: 05/21/2029

EMAIL ADDRESSES

SHANNON0022@YAHOO.COM
 PGARZARELLI@HOTMAIL.COM

ADDITIONAL DETAILS

Bankruptcies: 0
 Liens and Judgments: 0
 Criminal Records: 0
 Properties: 0
 Vehicles: 0

Important: The Public Records and commercially available data sources used on reports have errors. Data is sometimes entered poorly, processed incorrectly and is generally not free from defect. This system should not be relied upon as definitively accurate. Before relying on any data this system supplies, it should be independently verified. For Secretary of State documents, the following data is for information purposes only and is not an official record. Certified copies may be obtained from that

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IRBsearch does not constitute a "consumer report" as that term is defined in the federal Fair Credit Reporting Act, 15 USC 1681 et seq. (FCRA). Accordingly, IRBsearch may not be used in whole or in part as a factor in determining eligibility for credit, insurance, employment or another permissible purpose under the FCRA.

Exhibit 2

□ Erika & Eric (/wedding/ericerika)

Erika
Shannon
AND
Eric
Kullberg

April 20, 2019

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Exhibit 3



The State Bar of California

Erika N. Shannon #313228

License Status: Active

Address: 30 N Gould St, Ste 22721, Sheridan, WY 82801-6317

Phone: 310-601-8394 | Fax: Not Available

Email: Not Available | Website: Not Available

[More about This Attorney](#) ▲

CLA Sections: None

The California Lawyers Association (CLA) is an independent organization and is not part of the State Bar of California.

Self-Reported Practice Areas: None reported

Additional Languages Spoken:

- By the attorney: None reported
- By staff: None reported

Law School: Georgetown Univ Law Ctr; Washington DC

All changes of license status due to nondisciplinary administrative matters and disciplinary actions.

Date	License Status ⓘ	Discipline ⓘ	Administrative Action ⓘ
Present	Active		
12/8/2016	Admitted to the State Bar of California		

Additional Information:

- About the disciplinary system

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Exhibit 4

RETURN OF SERVICE
UNITED STATES DISTRICT COURT
SOUTHERN District of Florida

Case Number: 1:23-CV-21023-CMA

Plaintiff: **EDWIN GARRISON, ET AL., ON BEHALF OF THEMSELVES**
AND ALL OTHERS SIMILARLY SITUATED

vs.

Defendant: **KEVIN PAFFRATH, ET AL.**

For: THE MOSKOWITZ LAW FIRM, PLLC

Received by P.I. SERVICES on the 24th day of March, 2023 at 12:29 pm to be served on **ERIKA KULLBERG, 40 Waterside Plz, Apt 11D, NEW YORK, NY 10010. I, MUSAB NASSAR** do hereby affirm that on the 6 day of APRIL, 2023 at 07:40P.m., executed service by delivering a true copy of the **SUMMONS AND COMPLAINT (21 DAYS)** in accordance with state statutes in the manner marked below:

() INDIVIDUAL SERVICE: Served the within-named person.

☒ **SUBSTITUTE SERVICE:** By serving JERRY DOE as DOORMAN (REFUSED LAST NAME).

() POSTED SERVICE: After attempting service on ___/___ at ___ and on ___/___ at ___ to a conspicuous place on the property described herein.

() OTHER SERVICE: As described in the Comments below by serving ___ as ___.

() NON SERVICE: For the reason detailed in the Comments below.

COMMENTS: TAN SKIN MALE, WEARING HAT, AGE 45-60, HEIGHT 5'9"-6', WEIGHT 181-200LBS
DOORMAN CALLED RECIPIENT AND WAS TOLD TO ACCEPT THE DOCUMENTS.
DOORMAN REFUSED TO LET ME UP.
HAIR COLOR CANNOT BE DETERMINED

I certify that I have no interest in the above action, am of legal age and have proper authority in the jurisdiction in which this service was made.

Under Penalties of Perjury, I declare I have read the foregoing document and the facts stated in it are true and correct, NO NOTARY REQUIRED PURSUANT TO F.S. 92.525(2).

Musab Nassar

PROCESS SERVER # 2045119-DCA
Appointed in accordance with State Statutes

P.I. SERVICES
1430 S. Dixie Highway
Suite 105, #157
Coral Gables, FL 33146
(305) 666-0142

Our Job Serial Number: 2023000483